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▲Please Reply to Newark Office

September 30, 2015

Hon. Steve Mannion, U.S.M.J.
50 Walnut Street, Room 3053
Newark, NJ 07101

RE: Aguilar v. Fannie Mae
Civil Action No.: 2:14-CV-7963 SDW-SCM
Our File No.: 22921-01 H

Dear Judge Mannion:

This letter is being filed pursuant to the Court's request for a "Joint Agenda Letter."

The parties in this matter are still in process of completing factual discovery. Plaintiff has submitted Initial Disclosures and Answers to Interrogatories. Plaintiff has also submitted the report of Plaintiff's treating surgeon on the issue of causation and scope of damages to Plaintiff.

Defendant has submitted Initial Disclosures, but has not submitted Answers to Interrogatories as of this writing.

A copy of this letter was faxed over to adversary on September 29, 2015 however we have not heard from attorney Thomas Walters regarding the content of this matter.

Accordingly, the Conference in this matter must address to time required to complete factual discovery as well as the time to complete expert discovery.

Respectfully submitted,

ICAZA & BURGESS, P.C.

BY: DOUGLAS D. BURGESS, ESQ.

DDB/jr